

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED

NOV 29 2007  
Judge Charles P. Kocoras  
United States District Court

UNIVERSAL IMAGINE PRINT GROUP, LLC, )  
d/b/a IMAGINE PRINT GROUP )

Plaintiff, )

v. )

JAMES MULLEN, )

Defendant. )

07C 6720

JUDGE KOCORAS

MAGISTRATE JUDGE COX

**MOTION FOR TEMPORARY RESTRAINING ORDER**

UNIVERSAL IMAGINE PRINT GROUP, LLC, d/b/a IMAGINE PRINT GROUP, INC. ("Imagine Print Group"), by its attorneys, Horwood Marcus & Berk Chartered moves this Honorable Court, pursuant to FRCP 65(b), for the entry of a Temporary Restraining Order against the Defendant, JAMES MULLEN ("Mullen") and in support thereof states as follows:

1. Simultaneous with the following of the instant Motion For Temporary Restraining Order, Imagine Print Group has filed a verified Complaint for Injunctive Order and Relief, which sets forth the factual basis upon which Imagine Graphics now seeks the entry of the requested Temporary Restraining Order.

2. Based upon the facts alleged in Imagine Print Group's verified Complaint Injunctive and Other Relief, Imagine Print Group has met its burden of demonstrating:

- a) That it possesses a strong likelihood of success on the merits;
- b) There exists no adequate remedy at law;
- c) Irreparable harm will accrue to Imagine Print Group unless the requested Temporary Restraining Order is granted.

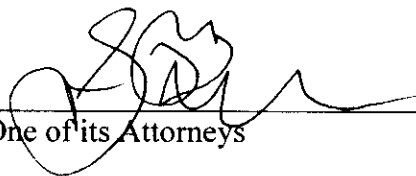
- d) The threat of continuing harm to Imagine Print Group far out weighs any perceived harm that might accrue to Mullen by virtue of the granting of the requested temporary restraining Order, and
- e) The issuance of requested Temporary Restraining Order will not undermine or contravene the public interest.

WHEREFORE, UNIVERSAL IMAGINE PRINT GROUP INC., d/b/a IMAGINE PRINT GROUP, LLC. moves this Honorable Court to enter a Temporary Restraining Order in favor of the Plaintiff against the Defendant, JAMES MULLEN as follows:

- A. Temporarily enjoining Mullen from using or disclosing to any third-party "Confidential Information" and/or "Employer Property", as those terms are defined in the parties' and Non-Disclosure Agreement;
- B. Mandatorily enjoining Mullen to return to Imagine Print Group, all "Confidential Information" and/or "Employer Property" taken by Mullen at or prior to the time that he resigned as Sales Manager of the Imagine Print Group;
- C. Such further relief as this Court may deem just and equitable.

Respectfully submitted,

**UNIVERSAL IMAGINE PRINT GROUP, LLC**  
**d/b/a IMAGINE PRINT GROUP, INC.**

By:   
One of its Attorneys

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